## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

State of Oklahoma, et al.,	) ) Plaintiffs, )	05-CV-0329 GKF-SAJ
V.	) ) )	AFFIDAVIT OF DELMAR R. ERICH IN SUPPORT OF THE CARGILL
Tyson Foods, Inc., et al.,	Defendants. )	DEFENDANTS' REPLY IN SUPPORT OF DKT. NO. 1380

STATE OF MINNESOTA	)
	) ss
COUNTY OF HENNEPIN	)

- I, Delmar R. Ehrich, hereby state as follows:
- I am a partner at Faegre & Benson, LLP. I represent Cargill, Inc. and Cargill 1. Turkey Production, LLC ("the Cargill Defendants") in the above-captioned litigation. I make this affidavit on personal knowledge and submit it in support of the Cargill Defendants' Reply in support of Defendants' Motion to Strike or Extend Response Deadline and For Establishment of Schedule for Resolving Plaintiffs' Motion for Preliminary Injunction (Dkt. No. 1380), which the Cargill Defendants have joined.
- In my representation of the Cargill Defendants, in addition to working directly 2. on this matter, I oversee and supervise other attorneys' work and experts' work.
- To prepare this Affidavit, I met with the attorneys and experts involved in 3. representing the Cargill Defendants in this matter.
- 4. Consistent with the views of Dr. Mansour Samadpour, our other expert teams report that they will need approximately three to six months after receiving all missing data

from Plaintiffs: a) to analyze the expert affidavits offered by Plaintiffs in support of their preliminary injunction motion, b) ascertain what all data and methodologies are missing from the affidavits and information produced to date, c) to review and analyze all newly produced data from Plaintiffs, d) to conduct any additional necessary site visits, sampling, or laboratory analyses, and e) to present their conclusions and opinions in the form of a written report.

THIS CONCLUDES MY AFFIDAVIT.

Delmar R. Ehrich

Subscribed and sworn to before me this 44th day of December, 2007.

Notary Public

My commission expires:

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